

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth, HTA and PBA.

**ORDER GRANTING FIVE HUNDRED THIRTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO SATISFIED CLAIMS**

Upon the *Five Hundred Thirteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Puerto Rico Public Buildings Authority to Satisfied Claims* [ECF No. 22250] (“Five Hundred Thirteenth Omnibus Objection”)<sup>2</sup> filed by the Commonwealth of Puerto Rico (the

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Thirteenth Omnibus Objection.

“Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth and HTA, the “Debtors”), dated September 16, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Five Hundred Thirteenth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Thirteenth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Thirteenth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in the column titled “Asserted” in Exhibit A to the Five Hundred Thirteenth Omnibus Objection (collectively, the “Satisfied Claims”) have been satisfied; and the Court having determined that the relief sought in the Five Hundred Thirteenth Omnibus Objection is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Thirteenth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Five Hundred Thirteenth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Satisfied Claims are disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Satisfied Claims as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22250 in Case No. 17-3283;  
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters  
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Five Hundred Thirteenth Omnibus Objection**

## Five Hundred Thirteenth Omnibus Objection

## Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO HECTOR E. VALDES ORTIZ, ESQ. 8461 LAKE WORTH ROAD SUITE 420 LAKE WORTH, FL 33467	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	24405	\$25,521.23
Reason: Proof of Claim asserts claim related to litigation case DAC-2013-1142. Commonwealth paid the liabilities on 01/09/2017 via check number 00086761.						
2	DAT@ACCESS COMMUNICATIONS INC. HECTOR FIGUEROA-VINCENTY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/04/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9470	\$9,375.55
Reason: Invoices 1005978 and 1006117 were paid via EFTs 75841 and 82656 on 05/02/2018 and 06/08/2018.						
3	DAT@ACCESS COMMUNICATIONS, INC HECTOR FIGUEROA-VINCENTY ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/04/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9455	\$2,626.83
Reason: Invoice totaling \$2,626.83 was paid via EFT 87561 on 06/27/2018.						
4	DATA SUPPLIES CORP P.O. BOX 41147 SAN JUAN, PR 00940-1147	05/18/2020	19-BK-05523-LTS	Puerto Rico Public Buildings Authority (PBA)	174007	\$625.00
Reason: Invoice totaling \$625.00 was paid via check 230020583 on 08/20/2020.						
5	HERNANDEZ CASTRODAD, FIDECICOMISO HC-06 BOX 72502 CAGUAS, PR 00725	11/01/2017	17 BK 03283-LTS	Commonwealth of Puerto Rico	259	\$91,516.25
Reason: Invoices totaling \$91,516.25 were paid via EFTs 00036712, 00043963, 00047091, 00051452, and 00053636 on 06/06/2017, 07/18/2017, 08/08/2017, 09/18/2017, and 10/25/2017.						

## Five Hundred Thirteenth Omnibus Objection

## Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
6	NETWAVE EQUIPMENT CO. HECTOR FIGUEROA-VINCENTY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/03/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9051	\$5,970.00
Reason: Invoices totaling \$5,970.00 were paid via EFTs 3602, 4443, and 5050 on 01/12/2018, 05/17/2018, and 09/05/2018.						
7	PUERTO RICO WIRE PRODUCTS, INC. PO BOX 363167 SAN JUAN, PR 00936-3167	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	35825	\$1,753.14
Reason: Invoices totaling \$1,753.14 were paid via checks 00046536 and 00086564.						
8	RIMACO, INC. P. O. BOX 8895 FERNANDEZ JUNCOS STATION SAN JUAN, PR 00910-0000	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	22328	\$3,865.50
Reason: Invoices totaling \$3,865.50 were paid via checks 84308, 84309, and 126473 on 06/06/2018, 06/06/2018, and 06/20/2019.						
9	TORRES MERCADO, GUMERSINDA EL TUQUE CALLE GA D20 PONCE, PR 00731	06/28/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	121466	Undetermined*
Reason: Proof of Claim asserts claim related to litigation case KEF-2011-0022. Judgment was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the order.						
					TOTAL	\$141,253.50*